

[Counsel listed on signature pages]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.

Plaintiff,

v.

GOOGLE INC.

Defendant.

Case No. CV 10-03561 WHA

**JOINT NOTICE REGARDING
PROPOSED PROTECTIVE
ORDERS**

Dept.: Courtroom 9, 19th Floor
Judge: Honorable William Alsup

1 Pursuant to the Court's November 19, 2010 Case Management Order (Dkt. No. 56), a
2 form of protective order was to be submitted by December 10, 2010. The parties met and
3 conferred in good faith and reached agreement on all but two issues: whether any in-house
4 counsel would have access to information of the highest designation, and whether a prosecution
5 bar would attach to persons accessing designated information. The parties respectfully request
6 the Court's assistance in resolving these issues. Attached as Exhibit A is Oracle America, Inc.'s
7 Proposed Protective Order and attached as Exhibit B is Google, Inc.'s Proposed Protective Order.
8 For the Court's convenience, attached as Exhibit C is a Table of Disputed Provisions. The parties
9 are prepared to address the issues promptly in written briefing and via telephone conference, or
10 hearing at the Court's discretion.

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Dated: December 10, 2010

By: /s/ Marc David Peters

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Dated: December 10, 2010 By: /s/ Steven T. Snyder

ATTESTATION OF CONCURRENCE

I, Marc D. Peters, as the ECF user and filer of this document, attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: December 10, 2010

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